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January 13, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: IM Telecom, LLC d/b/a Infiniti Mobile; WC Docket No. 11-42
Supplemental Notice of Forbearance from Obligation to Offer Lifeline-Supported
Broadband Service

Dear Ms. Dortch:

In accordance with the Public Notice released November 16, 2016 (DA 16-1316), and pursuant to procedures as set forth in the Federal Communication Commission's ("FCC" or the "Commission") *Lifeline Modernization Order*,¹ IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile") hereby provides the Commission with this supplemental notice of its intent to avail itself of forbearance from the obligation to offer Lifeline-supported broadband Internet access services ("BIAS") in its designated service area as described herein. Infiniti Mobile submitted its original Forbearance Notice in WC Docket No. 11-42 on January 11, 2016, and—per staff request—hereby supplements the record to expand the requested forbearance service area.

As outlined in Infiniti Mobile's original forbearance notice, the FCC designated BIAS as a Lifeline-supported service in its *Lifeline Modernization Order*.² At the same time, the Commission forbore from requiring Lifeline-only eligible telecommunications carriers ("ETCs") to offer Lifeline-supported BIAS services.³ Beginning December 2, 2016, Lifeline-only ETCs and high-cost recipients are obligated to offer Lifeline-supported BIAS throughout their designated service areas, except to the extent they have elected to avail themselves of forbearance relief from this obligation by filing notice with the Commission within thirty (30) days of receiving their ETC designations or a qualifying change to their high-cost support for a specific area.⁴

As a Lifeline-only ETC on a wireless basis in Oklahoma, Nevada, Wisconsin, Vermont, Maryland, Georgia, and South Carolina, Infiniti Mobile hereby provides the following required information to successfully avail itself from the requirement to offer BIAS:

¹ See *Lifeline and Link Up Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3972, paras. 30-32 (2016) ("*Lifeline Modernization Order*").

² *Id.*

³ *Id.* at 4071-74, paras. 297, 300-308.

⁴ See *id.* at 4072, 4075, paras. 301, 313; see also Lifeline Broadband Provider Designation Public Notice, at n.15.

I. Carrier Name

IM Telecom, LLC d/b/a Infiniti Mobile does not currently have any holding companies, operating companies, or any affiliates; it does not share common ownership with any other legal entity and both operates under and identifies itself using the following fictitious business name: Infiniti Mobile.

However, Infiniti Mobile works closely in association with the following companies—sharing no common ownership—to provide the listed services, respectfully: Whitehouse Wireless, LLC d/b/a WWUSA, which provides employment services; CDM Management, LLC, which handles regulatory matters; and AGVZ Management, LLC, which provides sales, marketing, and inventory services.

II. ETC Designation Information

Infiniti Mobile has been designated, on a wireless basis, as a Lifeline-only ETC in the following jurisdictions:

- a. **Oklahoma** – On July 5, 2012, the Corporation Commission of Oklahoma designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Cause No. PUD 201200045 via its *Final Order*, Order No. 599424.
- b. **Nevada** – On April 4, 2016, the Public Utilities Commission of Nevada designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 16-02022 via its *Order*.
- c. **Wisconsin** – On May 24, 2016, the Public Service Commission of Wisconsin designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 9694-TI-100, via its *Final Decision*, PSC Ref#: 286464. On June 16, 2016, the Public Service Commission of Wisconsin issued a *Correction Order*, PSC Ref#: 287381, in Docket No. 9694-TI-100, correcting a typographic error pursuant to Wis. Stat. § 196.39(4) and did not change the substance of the *Final Decision*.
- d. **Vermont** – On August 5, 2016, the State of Vermont Public Service Board designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 8687 via its *Order*.
- e. **Maryland** – On August 24, 2016, the State of Maryland Public Service Commission designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in ML#s 183297 and 196082 via its *Approval Notice Letter*, TE-11768.
- f. **Georgia** – On November 7, 2016, the Georgia Public Service Commission designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 40193 via its *Order on Application for Designation as an Eligible Telecommunications Carrier*, Document No. 165838.
- g. **South Carolina** – On November 30, 2016, the Public Service Commission of South Carolina designated Infiniti Mobile as a Lifeline-only ETC on a wireless basis in Docket No. 2016-279-C via its *Order Approving ETC Status*, Order No. 2016-795.

III. Areas Where Infiniti Mobile Seeks Forbearance

Infiniti Mobile seeks to expand the service area wherein it seeks to avail itself of forbearance relief from the requirement to provide BIAS, as originally indicated in its forbearance notice filed January 11, 2017. Specifically, through discussions with the FCC, Infiniti Mobile recognizes that the Commission's intent embodied in the *Lifeline Modernization Order* seeks to ensure universal access to BIAS, where offered. Therefore, as Infiniti Mobile seeks only to include BIAS as a service element for its Lifeline, Tribal offerings,⁵ it now also seeks forbearance from the obligation to provide BIAS in its entire service area wherein it has been designated as an ETC to date in the following additional jurisdictions: Nevada, Wisconsin, and South Carolina.

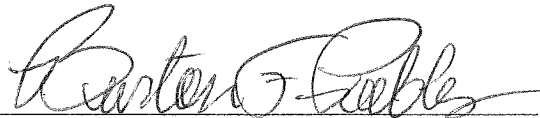
As of the date of this filing, Infiniti Mobile has not yet launched telecommunications service in said jurisdictions. During the initial process of coordinating with counsel to craft revised, proposed service offerings that comply with minimum service standards set forth in the *Lifeline Modernization Order*, and in further discussions with FCC staff this January, Infiniti Mobile confirmed the necessity of filing forbearance notice to include its service area wherein it does not intend to universally offer a Lifeline-supported plan that includes BIAS.

Please see attached Exhibit 3, which includes a list of supplemental Census-recognized geographic areas, specifically counties, for which Infiniti Mobile requests forbearance relief from the obligation to offer BIAS, including associated Federal Information Processing Standards ("FIPS") Codes. This service area should be considered in conjunction with Infiniti Mobile's originally filed Exhibit 1.

IV. Signature and Contact Information of Authorized Representative

As required, please see attached Exhibit 4, which includes a certification of Trevan Morrow, the Chief Operating Officer of Infiniti Mobile, who can be contacted at 1705 South Baltimore Ave., Tulsa, Oklahoma 74119, or via telephone at (918) 607-7379. If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,



Burton F. Peebles, Esq.

Associate Attorney

Lance J.M. Steinhart, P.C.

Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile

cc: Trevan Morrow
USAC

⁵ Currently, Infiniti Mobile does not intend to offer a Lifeline-supported service offering that includes BIAS as a basic element of service to Lifeline-eligible customers not residing on federally recognized Tribal lands in South Carolina, Wisconsin, Nevada, Maryland, Georgia, and Vermont. Infiniti Mobile will, however, offer service offerings including 500 MB of BIAS service to all Lifeline-eligible customers in Oklahoma.

Exhibit 3

Requested Supplemental Forbearance Service Area

| PSC State | County | FIPS Code |
|------------------|--------------------|------------------|
| NV | CARSON CITY (CITY) | 32, 510 |
| NV | CHURCHILL | 32, 001 |
| NV | CLARK | 32, 003 |
| NV | DOUGLAS | 32, 005 |
| NV | ELKO | 32, 007 |
| NV | ESMERALDA | 32, 009 |
| NV | HUMBOLDT | 32, 013 |
| NV | LANDER | 32, 015 |
| NV | LINCOLN | 32, 017 |
| NV | LYON | 32, 019 |
| NV | MINERAL | 32, 021 |
| NV | NYE | 32, 023 |
| NV | STOREY | 32, 029 |
| NV | WASHOE | 32, 031 |
| NV | WHITE PINE | 32, 033 |
| SC | ABBEVILLE | 45, 001 |
| SC | AIKEN | 45, 003 |
| SC | ALLENDALE | 45, 005 |
| SC | ANDERSON | 45, 007 |
| SC | BAMBERG | 45, 009 |
| SC | BARNWELL | 45, 011 |
| SC | BEAUFORT | 45, 013 |
| SC | BERKELEY | 45, 015 |
| SC | CALHOUN | 45, 017 |
| SC | CHARLESTON | 45, 019 |
| SC | CHEROKEE | 45, 021 |
| SC | CHESTER | 45, 023 |
| SC | CHESTERFIELD | 45, 025 |
| SC | CLARENDON | 45, 027 |
| SC | COLLETON | 45, 029 |
| SC | DARLINGTON | 45, 031 |
| SC | DILLON | 45, 033 |
| SC | DORCHESTER | 45, 035 |
| SC | EDGEFIELD | 45, 037 |
| SC | FAIRFIELD | 45, 039 |
| SC | FLORENCE | 45, 041 |
| SC | GEORGETOWN | 45, 043 |
| SC | GREENVILLE | 45, 045 |
| SC | GREENWOOD | 45, 047 |
| SC | HAMPTON | 45, 049 |
| SC | HORRY | 45, 051 |
| SC | JASPER | 45, 053 |
| SC | KERSHAW | 45, 055 |
| SC | LANCASTER | 45, 057 |
| SC | LAURENS | 45, 059 |
| SC | LEE | 45, 061 |

| PSC State | County | FIPS Code |
|------------------|---------------|------------------|
| SC | LEXINGTON | 45, 063 |
| SC | MARION | 45, 067 |
| SC | MARLBORO | 45, 069 |
| SC | MCCORMICK | 45, 065 |
| SC | NEWBERRY | 45, 071 |
| SC | OCONEE | 45, 073 |
| SC | ORANGEBURG | 45, 075 |
| SC | PICKENS | 45, 077 |
| SC | RICHLAND | 45, 079 |
| SC | SALUDA | 45, 081 |
| SC | SPARTANBURG | 45, 083 |
| SC | SUMTER | 45, 085 |
| SC | UNION | 45, 087 |
| SC | WILLIAMSBURG | 45, 089 |
| SC | YORK | 45, 091 |
| WI | ADAMS | 55, 001 |
| WI | BARRON | 55, 005 |
| WI | BROWN | 55, 009 |
| WI | BUFFALO | 55, 011 |
| WI | BURNETT | 55, 013 |
| WI | CALUMET | 55, 015 |
| WI | CHIPPEWA | 55, 017 |
| WI | COLUMBIA | 55, 021 |
| WI | DANE | 55, 025 |
| WI | DODGE | 55, 027 |
| WI | DOOR | 55, 029 |
| WI | DUNN | 55, 033 |
| WI | EAU CLAIRE | 55, 035 |
| WI | FOND DU LAC | 55, 039 |
| WI | GRANT | 55, 043 |
| WI | GREEN | 55, 045 |
| WI | GREEN LAKE | 55, 047 |
| WI | IOWA | 55, 049 |
| WI | JACKSON | 55, 053 |
| WI | JEFFERSON | 55, 055 |
| WI | JUNEAU | 55, 057 |
| WI | KENOSHA | 55, 059 |
| WI | KEWAUNEE | 55, 061 |
| WI | LA CROSSE | 55, 063 |
| WI | LAFAYETTE | 55, 065 |
| WI | MANITOWOC | 55, 071 |
| WI | MARATHON | 55, 073 |
| WI | MARINETTE | 55, 075 |
| WI | MARQUETTE | 55, 077 |
| WI | MENOMINEE | 55, 078 |
| WI | MILWAUKEE | 55, 079 |

| PSC State | County | FIPS Code |
|------------------|---------------|------------------|
| WI | MONROE | 55, 081 |
| WI | OCONTO | 55, 083 |
| WI | ONEIDA | 55, 085 |
| WI | OUTAGAMIE | 55, 087 |
| WI | OZAUKEE | 55, 089 |
| WI | PEPIN | 55, 091 |
| WI | PIERCE | 55, 093 |
| WI | POLK | 55, 095 |
| WI | PORTAGE | 55, 097 |
| WI | RACINE | 55, 101 |
| WI | ROCK | 55, 105 |
| WI | SAUK | 55, 111 |
| WI | SHAWANO | 55, 115 |
| WI | SHEBOYGAN | 55, 117 |
| WI | ST. CROIX | 55, 109 |
| WI | TAYLOR | 55, 119 |
| WI | TREMPEALEAU | 55, 121 |
| WI | VERNON | 55, 123 |
| WI | WALWORTH | 55, 127 |
| WI | WASHINGTON | 55, 131 |
| WI | WAUKESHA | 55, 133 |
| WI | WAUPACA | 55, 135 |
| WI | WAUSHARA | 55, 137 |
| WI | WINNEBAGO | 55, 139 |
| WI | WOOD | 55, 141 |

Exhibit 4

**Certification of Trevan Morrow, Chief Operating Officer (“COO”) of
IM Telecom, LLC d/b/a Infiniti Mobile**

STATE OF OKLAHOMA

COUNTY OF TULSA

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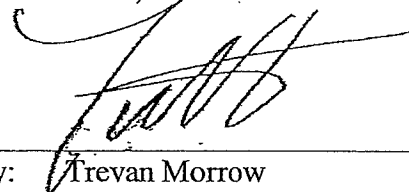
CERTIFICATION

I, Trevan Morrow, hereby state under penalty of perjury as follows:

1. I am Chief Operating Officer of IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile" or the "Petitioner"), an Oklahoma limited liability company with its principal place of business at 1705 South Baltimore Ave., Tulsa, Oklahoma 74119. I may be contacted at the same address.
2. I may also be contacted via telephone at (918) 607-7379.
3. I have read the foregoing Forbearance Notification Supplement and confirm the information contained therein to be true and correct to the best of my knowledge.
4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 1-13-17

IM Telecom, LLC d/b/a Infiniti Mobile


By: Trevan Morrow
Chief Operating Officer

